

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(Baltimore Division)

IN RE: Natalie Tao,

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Case No. 19-18681-DER

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✻

Debtor.

## Chapter 13

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Lakeside National LLC,  
Movant(s)

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✻

✱

VS.

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✻

Natalie Tao, Debtor  
Respondent(s)

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**RESPONSE TO MOTION FOR RELIEF FROM STAY AND NOTICE OF  
MOTION AND REQUEST FOR HEARING**

NOW COMES the Debtor, Natalie Tao, by counsel, Jeffrey M. Sirody & Assoc., and files this response to the Motion for Relief from Automatic Stay, and responds to each enumerated paragraph as follows:

1. Admit.
2. Admit.
3. Admit.
4. Deny.
5. This is a statement of law.
6. Deny.
7. Admit.
8. Admit.
9. Respondent is without sufficient information to admit or deny, and so denies.
10. Admit.
11. Respondent is without sufficient information to admit or deny, and so denies.
12. Admit.
13. Deny.

14. This is a statement of law.
15. Deny.
16. This is a statement of law.
17. Admit.
18. Admit.
19. Admit.
20. Deny.

WHEREFORE, the Debtor respectfully requests that this Honorable Court grant a hearing on this request and Deny the Motion for Relief from Stay.

Respectfully submitted,

Date: July 24, 2019

/s/ Jeffrey M. Sirody  
Jeffrey M. Sirody, Fed. Bar No. 11715  
Jeffrey M. Sirody & Associates  
1777 Reisterstown Road, Suite 360 E  
Baltimore, MD 21208  
(410) 415-0445  
Attorney for Debtor/Respondent

### **CERTIFICATE OF SERVICE**

I hereby certify that July 24, 2019, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the Response to Motion for Relief will be served electronically by the Court's CM/ECF system on the following:

Chapter 13 Trustee, Robert Thomas, II at [ecf@ch13balt.com](mailto:ecf@ch13balt.com)  
Gerard F. Miles, attorney for Movant at [buddy@lawhjm.com](mailto:buddy@lawhjm.com)

/s/ Jeffrey M. Sirody  
Jeffrey M. Sirody